PATENT

File: MCEA-P3-03

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Inventors : CONROY, Thomas F., EISENBERG, Steven A.,

KRAYSLER, Stephen F., MANN, Richard W.

Serial No. : 10/687,063

Filed : October 16, 2003

For : COMPUTER SYSTEM FOR MANAGING FLUCTUATING

CASH FLOW(S)

Group Art Unit : 3691

Examiner : SHRESTHA, Bijendra K.

MS: Petitions

Commissioner of Patents

P.O. Box 1450

Alexandria, VA 22313-1450

PETITION TO CHANGE SUBCLASSIFICATION

SIR:

Applicant respectfully petitions for a change of subclass. The current subclass is listed as 38, which is believed appropriate, but the PTO web site shows the patent application as also in subclass 36T, which is believed to be inappropriate.

Subclass 36T is for tax strategies, but Applicant's claims do not mention <u>tax</u> and the inventive concepts in the application are not believed to be tax strategies, and thus is in error.

It is respectfully suggested that, if any additional subclass were to be listed, the appropriate subclass should be subclass 4 (Insurance). Attention is drawn to, Claim 1, which mentions

. . .

receiving respective descriptions of risks;

receiving statistical assumptions for said risks;

Ser. No. 10/687,063 Atty. Ref. MCEA-P3-03 Art Unit 3691

receiving financial assumptions for said risks;

calculating, from the descriptions and the assumptions, expected cash flows corresponding to said risks for time periods;

receiving actual cash flows information from occurrence of events corresponding to said risks;

. . .

Dependent claims 5-8, for example, mention <u>insurance</u>, and claim 10 mentions reinsurance.

Attention is drawn to Rule 1.75; MPEP section 903.04 Rules for classification, original; and MPEP section 903.08a-e Internal guidelines for classification and transfers.

It is respectfully submitted that the above-identified patent application is improperly subclassified in subclass 36T. If any subclass beyond 38 is to be mentioned, it is suggested that subclass 4 is a more appropriate subclass.

The Commissioner is hereby authorized to charge any fees associated with the above-identified patent application, or credit any overcharges to Deposit Account No. 50-0235.

Please direct all communication to the undersigned at the address given below.

Respectfully submitted,

Date:

December 10, 2007

Peter K. Trzyna (Reg. No. 32,601)

(Customer No. 28710)

P.O. Box 7131 Chicago, IL 60680-7131 (312) 240-0824